

EXHIBIT A

Olivia Flechsig

From: Olivia Flechsig
Sent: Wednesday, August 28, 2024 2:33 PM
To: Robert Mussig
Cc: Angie Paz; Josie Pena; Dolores Leal; Tracey Kennedy; Sarah Fan
Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Hi Robert,

That will be fine. We will plan to take Ms. Tse and Mr. Power's depositions remotely then. Please let us know their upcoming availability ASAP.

Best,
Olivia

From: Robert Mussig <RMussig@sheppardmullin.com>
Sent: Wednesday, August 28, 2024 6:54 AM
To: Olivia Flechsig <oflechsig@amglaw.com>
Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>
Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

A 9:30 start time is fine but he may need accommodations due to the time difference, e.g., an early lunch.

Ms. Tse and Mr. Powers are both in Texas.

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From: Olivia Flechsig <oflechsig@amglaw.com>
Sent: Monday, August 26, 2024 2:05 PM
To: Robert Mussig <RMussig@sheppardmullin.com>
Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>
Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

We first noticed Dr. Levy's deposition with a 9:30 am start time on July 11th, then changed the date to accommodate his schedule over three weeks ago. Unfortunately we are not able to start his deposition at 7 am, and we will need to stick with the 9:30 am start time.

For Thalia Tse and Andrew Powers, where are they located out of state? We would like to know their locations before deciding whether to take their depositions remotely.

Thank You,
Olivia

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From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Thursday, August 22, 2024 2:11 PM

To: Olivia Flechsig <oflechsig@amglaw.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

We will let Ms. Lott know we can assume her deposition will be remote.

Also, Dr. Levy needs to start early – can we start his deposition at 7 am?

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, August 22, 2024 1:14 PM

To: Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Let's assume for the time being that Gia Lott's deposition will be going forward remotely, but I want to reserve our right to do it in-person if Dolores feels otherwise. If that is the case and we decide to have it go forward remotely, and it won't work with Ms. Lott's schedule, we can work with you on a new date if necessary.

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From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Thursday, August 22, 2024 8:44 AM

To: Olivia Flechsig <oflechtsig@amglaw.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

We will get additional dates from her in that same timeframe. It would be helpful for planning purposes to be able to tell her the deposition will be remote.

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From: Olivia Flechsig <oflechtsig@amglaw.com>

Sent: Wednesday, August 21, 2024 3:51 PM

To: Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Hi Robert,

Dolores is out so I will have to get back to you about the locations. We have another deposition on 9/5, are there any other upcoming dates Ms. Lott will be available?

Best,
Olivia

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From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Wednesday, August 21, 2024 2:53 PM

To: Olivia Flechsig <oflechtsig@amglaw.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Olivia,

I also realized you noticed Thalia Tse and Andrew Powers to go forward in person in Los Angeles. They are both out of state as well. Can you confirm those will be remote? Thanks,

Rob

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Sent: Wednesday, August 21, 2024 2:24 PM

To: Olivia Flechsig <oflechtsig@amglaw.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Hi Olivia,

Just wanted to let you know we're still waiting on dates for these three but we'll provide them as soon as possible.

Also, I misstated Gia Lott's availability. She is not available on 9/3. However, she is available on 9/5. Will that work? I apologize for the inconvenience. Also, she is located in Houston. Can you confirm you are taking her deposition remotely? Thank you.

Rob

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Monday, August 12, 2024 2:51 PM

To: Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Also, please let us know as soon as you can regarding the scheduling availability for Andrew Powers, Dr. Asekomeh, and Thalia Tse – we're still waiting to reschedule these.

Best,
Olivia

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From: Olivia Flechsig

Sent: Monday, August 12, 2024 12:56 PM

To: 'Robert Mussig' <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; 'Tracey Kennedy' <TKennedy@sheppardmullin.com>; 'Sarah Fan' <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Dear Counsel,

To avoid any confusion, I wanted to confirm that you do not require updated depo notices for Dr. Levy's depo to go forward on August 30, 2024 and Ms. Lott's to go forward on September 3, 2024. Please let us know if you will require us to reissue amended notices that reflect the new dates. If we don't hear from you, we will assume it is not necessary.

Thank You,
Olivia

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From: Olivia Flechsig

Sent: Thursday, August 1, 2024 12:57 PM

To: Robert Mussig <RMussig@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>; Dolores Leal <dleal@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Dear Robert,

We will plan to take Dr. Levy's depo on August 30th and Ms. Lott's on September 3rd.

Best,
Olivia

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From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Thursday, August 1, 2024 12:30 PM

To: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflechtsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Yes that is fine.

Dr. Levy is available August 28, 29, or 30 and Gia Lott is available September 3, 4, or 5. Let us know if any of those dates work for you. We are still working on the others.

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From: Dolores Leal <dleal@amglaw.com>

Sent: Wednesday, July 31, 2024 5:37 PM

To: Robert Mussig <RMussig@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

I forgot to remind you that discovery closes on 8/13/24, but I assume you're fine with having depositions take place after that date since they were duly noticed.

Dolores Y. Leal

Pronouns: she/her

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From: Dolores Leal

Sent: Wednesday, July 31, 2024 3:16 PM

To: Robert Mussig <RMussig@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Thanks for the update Robert.

Dolores Y. Leal

Pronouns: she/her

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From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Wednesday, July 31, 2024 1:38 PM

To: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Hi Dolores,

We're still working on getting dates from our client. I understand you want to move forward. Thank you for your patience. I am hoping we can start providing dates today or tomorrow.

Rob

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From: Dolores Leal <dleal@amglaw.com>

Sent: Monday, July 29, 2024 9:24 AM

To: Robert Mussig <RMussig@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Good morning,

Following up on your email with dates for the individuals whose depositions we noticed.
Thank you.

Dolores Y. Leal

Pronouns: she/her

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LEADERSHIP FOR GREATER PURPOSE



From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Monday, July 22, 2024 11:26 AM

To: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Thank you. We will get back to you with dates as soon as possible.

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From: Dolores Leal <dleal@amglaw.com>

Sent: Monday, July 22, 2024 11:24 AM

To: Robert Mussig <RMussig@sheppardmullin.com>; Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Hello Robert,

Thank you for your email. Yes, we agree that the noticed dates are off calendar and we'll work to select dates which work for all.

Best,
Dolores

Dolores Y. Leal

Pronouns: she/her

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LEADERSHIP FOR GREATER PURPOSE



From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Monday, July 22, 2024 11:16 AM

To: Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Sarah Fan <SFan@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Hi Olivia,

We have not been able to nail down any dates with the witnesses. We are working with our client to do so but in the meantime it seems clear the noticed dates aren't going to work. Can we agree the noticed dates are off and we'll provide you new dates as soon as possible? Please let us know. Thanks,

Rob

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, July 18, 2024 9:48 AM

To: Robert Mussig <RMussig@sheppardmullin.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Linda Shen <LShen@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: Re: MARK SNOOKAL v. CHEVRON USA INC.

We appreciate that, thanks Robert.

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From: Robert Mussig <RMussig@sheppardmullin.com>

Sent: Thursday, July 18, 2024 9:34:21 AM

To: Olivia Flechsig <oflechsig@amglaw.com>; Tracey Kennedy <TKennedy@sheppardmullin.com>; Linda Shen <LShen@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

We are working with our client to determine availability. We will let you know as soon as possible.

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From: Olivia Flechsig <oflechsig@amglaw.com>

Sent: Thursday, July 18, 2024 9:32 AM

To: Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Linda Shen <LShen@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Angie Paz <apaz@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: RE: MARK SNOOKAL v. CHEVRON USA INC.

Good Morning Counsel,

Can you please let us know as soon as possible whether these depositions will be going forward as noticed?

Thank You,
Olivia

Olivia Flechsig, Esq.
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From: Angie Paz <apaz@amglaw.com>

Sent: Thursday, July 11, 2024 12:35 PM

To: Tracey Kennedy <TKennedy@sheppardmullin.com>; Robert Mussig <RMussig@sheppardmullin.com>; Linda Shen <LShen@sheppardmullin.com>

Cc: Dolores Leal <dleal@amglaw.com>; Olivia Flechsig <oflechsig@amglaw.com>; Josie Pena <jpena@amglaw.com>

Subject: MARK SNOOKAL v. CHEVRON USA INC.

Dear Counsel,

See attached correspondence dated today from Olivia Flechsig along with the following notices of deposition:

1. Dr. Scott Levy;
2. Dr. Eshiofe Asekomeh;
3. Gia Lott
4. Thalia Tse; and
5. Andrew Powers

ALLRED MAROKO GOLDBERG

JUSTICE | INTEGRITY | REPUTATION

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